

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WELLS FARGO ADVISORS, LLC,

PETITIONER,

V.

**REAGAN TUCKER, BENJAMIN
DOOLEY, AND MARVIN GLASGOLD,**

RESPONDENT.

Civil Action No. 15-cv-07722 (ALC)

**DECLARATION OF
KENNETH J. TURNBULL IN SUPPORT
OF PETITION TO DISMISS OR IN THE
ALTERNATIVE STAY THE PENDING
ARBITRATION AND COMPEL
INDIVIDUAL ARBITRATION IN
ACCORDANCE WITH THE BINDING
ARBITRATION AGREEMENTS**

Document Electronically Filed

I, Kenneth J. Turnbull, Esquire, hereby declare as follows:

1. I am a partner at the law firm of Morgan, Lewis & Bockius LLP, counsel of record for Petitioner Wells Fargo Advisors LLC (“Wells Fargo”). I have personal knowledge of the facts set forth in this declaration and make this declaration in support of Wells Fargo’s Petition to Dismiss or in the Alternative Stay the Pending Arbitration and Compel Individual Arbitration in Accordance With the Binding Arbitration Agreements.

2. Attached hereto as Exhibit “A” is a true and correct copy of Respondent Reagan Tucker’s New Financial Advisor Training Agreement, as maintained by Wells Fargo.

3. Attached hereto as Exhibit “B” are true and correct copies of Respondent Benjamin Dooley’s New Financial Advisor Training Agreements, as maintained by Wells Fargo.

4. Attached hereto as Exhibit “C” is a true and correct copy of Respondent Marvin Glasgold’s New Financial Advisory Training Agreement, as maintained by Wells Fargo.

5. Attached hereto as Exhibit “D” is a true and correct copy of the Statement of Claim filed by Respondents at the Financial Industry Regulatory Authority (“FINRA”) on July 23, 2015.

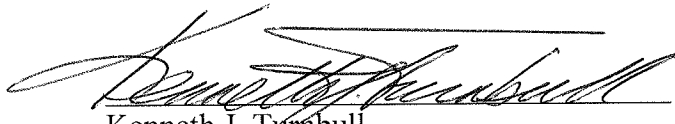
6. Attached hereto as Exhibit “E” is a true and correct copy of the Statement of Claim filed by Respondents at the American Arbitration Association (“AAA”) on July 23, 2015.

7. Attached hereto as Exhibit “F” is a true and correct copy of the Complaint filed in *Williams, et al. v. Wells Fargo Advisors, LLC*, N.D. Ill. Case No. 14-CV-1981-JJT-AK.

8. Attached hereto as Exhibit “G” is a true and correct copy of the American Arbitration Association’s Securities Arbitration Rules, effective May 1, 1993.

I declare under the penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 30 day of September, 2015.


Kenneth J. Turnbull